
**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

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|--------------------------|---|----------------------------------|
| UNITED STATES OF AMERICA | : | Hon. Lois H. Goodman |
| | : | |
| v. | : | Mag. No. 22-5006 (LHG) |
| | : | |
| JOHN SINGLETON | : | <u>CRIMINAL COMPLAINT</u> |

I, Raj B. Shukla, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives, and that this complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached pages and made a part hereof.

s/ Raj. B Shukla

RAJ B. SHUKLA, SPECIAL AGENT
BUREAU OF ALCOHOL, TOBACCO,
FIREARMS AND EXPLOSIVES

SPECIAL AGENT RAJ B. SHUKLA
ATTESTED TO THIS AFFIDAVIT BY
TELEPHONE PURSUANT TO F.R.C.P.
4.1(B)(2)(A) ON THIS 2ND DAY OF JUNE,
2022.



HON. LOIS H. GOODMAN
UNITED STATES MAGISTRATE JUDGE

ATTACHMENT A

**COUNT ONE
(Possession of a Firearm by a Convicted Felon)**

On or about January 28, 2022, in Middlesex County, in the District of New Jersey and elsewhere, the defendant,

JOHN SINGLETON,

knowing that he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess two firearms, namely, an HS Produkt (Springfield Armory), .45 auto caliber semiautomatic pistol, bearing serial number S3126807, loaded with five (5) rounds of .45 caliber hollow-point ammunition; and a Troy Defense, .223 Remington caliber pump action rifle, bearing serial number TPA04145109; and the firearms were in and affecting commerce.

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT TWO
(Possession with Intent to Distribute a Controlled Substance)

On or about January 28, 2022, in Middlesex County, in the District of New Jersey and elsewhere, the defendant,

JOHN SINGLETON,

did knowingly and intentionally possess with intent to distribute controlled substances, namely, heroin, a Schedule I controlled substance, and fentanyl (N-phenyl-N- [1- (2-phenylethyl) -4-piperidiny1] propenamide), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

ATTACHMENT B

I, Raj B. Shukla, am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives. I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and photographs of the evidence. Because this complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where the contents of documents and the actions and statements of others are reported herein, they are reported in substance and in part, except where otherwise indicated. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

1. In or around January 2022, law enforcement began investigating the illegal distribution of controlled dangerous substances by defendant JOHN SINGLETON ("SINGLETON"). During that investigation, law enforcement observed SINGLETON engage in multiple suspected drug transactions with various individuals. Based on the investigation, law enforcement obtained a warrant to search SINGLETON and his residence in Parlin, New Jersey.

2. On January 28, 2022, while surveilling the area of SINGLETON's residence in anticipation of executing the search warrant, SINGLETON exited the residence and departed in his vehicle. Law enforcement followed SINGLETON to a parking lot, where officers observed SINGLETON engage in what appeared to be a narcotics transaction with another individual, whom law enforcement had previously observed engage in similar transactions with SINGLETON. Law enforcement approached and detained SINGLETON and the other individual, and searched SINGLETON's person and vehicle.

3. From SINGLETON's person, law enforcement recovered one (1) sealed brick containing fifty (50) wax paper folds stamped "Peace of Mind," containing a white, powdery substance; one (1) opened brick containing thirty (30) wax paper folds stamped "Gucci," containing a white, powdery substance; and \$987 in United States currency. Subsequent testing confirmed that the wax paper folds contained detectable amounts of heroin and fentanyl.

4. From the other individual's vehicle, law enforcement recovered one (1) brick containing fifty (50) wax paper folds stamped "Gucci," containing a white, powdery substance. Subsequent testing confirmed that the wax paper folds contained detectable amounts of heroin and fentanyl.

5. Thereafter, law enforcement executed the search warrant for SINGLETON's residence, from which it recovered one hundred fifty one (151) wax paper folds containing a white, powdery substance, with one hundred fifty (150) of those wax paper folds stamped "Gucci" and one (1) stamped "Fire &

Fury”; an HS Produkt (Springfield Armory), .45 auto caliber semiautomatic pistol, bearing serial number S3126807, loaded with five (5) rounds of .45 caliber hollow-point ammunition; and a Troy Defense, .223 Remington caliber pump action rifle, bearing serial number TPA04145109 (collectively, the “Firearms”). Subsequent testing confirmed that the wax paper folds contained a detectable amount of heroin and fentanyl. Immediately prior to the search of SINGLETON’s residence, SINGLETON voluntarily admitted to law enforcement, in sum and substance, to having possessed the narcotics and Firearms found in his residence.

6. On December 10, 2007, SINGLETON was convicted in the Superior Court of New Jersey, Middlesex County, of distribution of a controlled dangerous substance on school property, in violation of N.J.S.A. 2C:35-7, and he was sentenced to seven years’ imprisonment with thirty months of parole ineligibility.

7. The Firearms were manufactured outside of the State of New Jersey, and thus traveled in interstate commerce before SINGLETON possessed them in New Jersey on January 28, 2022.